

DECLARATION OF ASSISTANT FIELD OFFICE DIRECTOR

ALAN GREENBAUM

Pursuant to the authority of 28 U.S.C. § 1746, I, Alan Greenbaum, an Assistant Field Office Director for U.S. Department of Homeland Security, United States Immigration and Customs Enforcement, Enforcement and Removal Operations, Burlington, Massachusetts declare as follows:

1. I am an Assistant Field Office Director (“AFOD”) for U.S. Department of Homeland Security, United States Immigration and Customs Enforcement, Enforcement and Removal Operations (“ICE”). I have served as an AFOD for 3 years.
2. Included in my official duties as an AFOD in Burlington, Massachusetts is the responsibility for managing and monitoring the scheduling and execution of removal orders for aliens in ICE custody. I am also familiar with ICE policies and procedures for releasing individuals from ICE custody.
3. I have experience utilizing ICE record systems to obtain information regarding specific aliens. ICE maintains electronic and paper records on aliens in the course of its regularly conducted business activity. These records are made in the course of regularly conducted business activity at or near the time of relevant events by a person with knowledge of these events. In preparing this declaration, I have examined ICE official records, including the Enforce Alien Removal Module (“EARM”). EARM is the ICE electronic database utilized by ERO to maintain information regarding the custody and removal status of aliens.
4. In the course of preparing this declaration, I have examined the official records available to me regarding the immigration history and release orders of Desmond Lee Joseph

Administrative File No. [REDACTED] 852 and Kevon Gary Mahadeo Administrative File No. [REDACTED]-840. I have also discussed these cases internally with Officers within my office.

5. At no point did I personally interact with or communicate with any of the two named individuals listed above. My responsibilities were limited to the direction to release these individuals pursuant to the judicial order and review and approval of the release forms issued by ICE.
6. On April 10, 2020, ICE was ordered to release Mr. Mahadeo and Mr. Joseph pursuant to a judicial order of bail. This Court order and its terms and conditions were conveyed to the officers physically present in the ICE office located in Burlington, MA where the releases would occur from.
7. The Deportation Officers prepared a Form I-220A, Order of Release on Recognizance ("OREC"), for both and e-mailed the forms to me for my review.
8. For Mr. Mahadeo, Deportation Officer Jennifer Saravia prepared the OREC. The OREC included the Court's bail conditions which included the order that he remain fully quarantined for 14 days after leaving the facility and that after the 14-day quarantine period, he was subject to house arrest.
9. After reviewing the OREC for accuracy and completeness, I signed it and returned it to the Deportation Officers for service. Upon my review of the OREC, I note that Deportation Officer Casey Hyde served the OREC on Mr. Mahadeo.
10. For Mr. Joseph, Deportation Officer Jennifer Saravia prepared the OREC. The OREC included the Court's bail conditions which included the order that he remain fully quarantined for 14 days after leaving the facility and that after the 14-day quarantine period, he was subject to house arrest.

11. After reviewing the OREC for accuracy and completeness, I signed it and returned it to the Deportation Officers for service. Upon my review of the OREC, I note that Deportation Officer Casey Hyde served the OREC on Mr. Joseph.

I declare under penalty of perjury that the foregoing is true and correct.

Signed on the Twenty Second day of June, 2020

Alan Greenbaum
Assistant Field Office Director
U.S. Department of Homeland Security
United States Immigration and Customs Enforcement
Burlington, Massachusetts